

EXHIBIT 67



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2 of the alumni who had donated to the
3 school?

4 A Yes.

5 Q Do you know if anyone in
6 development ever communicated with anyone
7 in admissions concerning that list?

8 A There was a database. There
9 really wasn't a list. The database
10 contained all alumni and parents,
11 non-alumni parents, prospective donors to
12 the college. So it was a fairly large
13 database.

14 Q Did the database have a name?

15 A The last database that I was
16 aware of was called "Advance."

17 Q And do you know if it had a
18 different name before then?

19 A It did, but I'm blanking on that
20 name.

21 Q You don't remember everything
22 about your 33 years at Dartmouth?

23 A Sorry, I don't.

24 Q Do you recall if it had a
25 different name -- you recall it had a

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2 Q And can you tell me what a
3 priority list was during your tenure?

4 A That was a list that advancement
5 developed to indicate to the admissions
6 office who was a priority for admissions
7 for advancement, the same way that the
8 football coach may have a list of recruits
9 that he wanted to have, you know, be
10 considered by the admissions office.

11 Q Did you play any role in
12 creating priority lists?

13 A Yes.

14 Q And when did you first start
15 playing a role, during your tenure at
16 Dartmouth, in creating priority lists?

17 A As director of special projects
18 and reporting.

19 Q So when you assumed that
20 title --

21 A Yes.

22 Q -- is when you first started
23 being involved in preparing priority lists?

24 A Yes.

25 Q And did the way you were

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2 involved in preparing priority lists evolve
3 at all once you started doing so?

4 MS. MASCHERIN: Object to the
5 form.

6 A Can you explain again the way?

7 Q Well, when you first started
8 playing any role in creating priority
9 lists, can you explain to me what that role
10 was?

11 A It was to put together a
12 priority list. There was a first draft
13 that I would come up with to determine a
14 priority list of applicants either in the
15 decision process, and that was presented to
16 different individuals over the course of
17 our evaluation of those priority lists.

18 Q And do you recall, when you
19 first started in on that work, what factors
20 might be relevant to having someone be put
21 on a priority list?

22 MS. MASCHERIN: Object to the
23 form.

24 BY MR. NORMAND:

25 Q That's a pretty broad one, I

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2 admissions office with requests.

3 Q And if you recall, in what form
4 would you -- in what way would you pass
5 along priority lists to admissions?

6 A It was done on a secure -- in
7 later years, it was done on a secure file
8 server.

9 Q And do you recall how it was
10 done prior to that?

11 A It was done through e-mails.

12 Q And it was called, if you
13 recall, "priority list"?

14 A Yes.

15 Q Do you recall for approximately
16 how many years you prepared priority lists?

17 A The 10 years that I was involved
18 in that.

19 Q Do you know if anyone had done
20 that before you began doing it?

21 A Yes.

22 Q And do you know who that person
23 was or what their title was, or both?

24 A Don't recall the title, but the
25 person was Paul Killebrew, who had the

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2 position before I did.

3 Q And do you know how long Paul
4 Killebrew had that position?

5 MS. MASCHERIN: Object to the
6 form.

7 A Not exactly, no.

8 Q Do you know if anyone did that
9 priority list work before Paul Killebrew?

10 A I believe it was Jennifer
11 Williams.

12 Q And do you know if anyone did it
13 before Jennifer Williams?

14 A Not to my recollection.

15 Q Do you recall about when
16 Jennifer Williams would have started doing
17 that work?

18 A I don't.

19 MS. MASCHERIN: Object to form.

20 A I don't.

21 Q And if you know, during the time
22 that Jennifer Williams was preparing
23 priority lists, was she the only one at the
24 school preparing priority lists?

25 MS. MASCHERIN: Object to the

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2 form.

3 Q Did you, with any frequency,
4 communicate with the admissions office
5 about the people on your priority list?

6 MS. MASCHERIN: Object to the
7 form.

8 A With frequency, that was the
9 question?

10 Q The question was, with any
11 frequency.

12 MS. MASCHERIN: Object to the
13 form.

14 BY MR. NORMAND:

15 Q So I could just ask you, if you
16 recall, with what frequency did you
17 interact with the admissions office
18 regarding the people on your priority
19 lists?

20 A Several times during each cycle.

21 Q And when you say, "cycle," can
22 you explain to me what -- so we're on the
23 same page -- what period of time you have
24 in mind with regard to the cycle?

25 A Cycle would have been for early

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2 received them indirectly?

3 MS. MASCHERIN: Object to the
4 form.

5 A If the priority list was sent to
6 the secured file server, Peg Chase, as the
7 assistant to the dean, may have retrieved
8 them from there.

9 Q Okay. Did the identity of the
10 recipients who would receive your priority
11 lists vary from year to year during the
12 years that you were creating them?

13 MS. MASCHERIN: Object to the
14 form.

15 A Only if the positions -- you
16 know, the people in the positions changed.

17 Q Right. And what were, if you
18 recall, the positions that would receive
19 them directly from you?

20 A The priority lists?

21 Q Yes, sir.

22 A They would be people in the
23 development office when we met to discuss
24 them, as well as people in the alumni
25 relations office, directors -- you know,

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2 the director heads.

3 Q And you don't know if those
4 director or department heads passed them
5 along to admissions?

6 A I do not know that.

7 MR. NORMAND: All right. Tab 8.

8 (Exhibit 8, Dartmouth Senior
9 Administration org chart, dated November
10 2018, Bates stamped DARTMOUTH_0000001733,
11 was marked as of this date.)

12 BY MR. NORMAND:

13 Q Exhibit 8 is an org chart dated
14 at the bottom right November 2018, and
15 titled at the top, "Senior Administration."

16 Have you seen this document
17 before, Mr. Sassorossi?

18 A No, I have not.

19 Q Okay. And do you know as of
20 this time who you reported to on this
21 chart? Would it have been Mr. Lasher on
22 the right, third level down?

23 MS. MASCHERIN: Object to the
24 form.

25 A No, it would not have been.

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2 Exhibit 12.

3 (Exhibit 12, document, Bates
4 stamped DARTMOUTH_0000089556 through 557,
5 was marked as of this date.)

6 BY MR. NORMAND:

7 Q Exhibit 12 is an undated
8 document under the Bates 89556.

9 I will represent that it was
10 produced by the files from Dartmouth's
11 admission and financial aid office, and the
12 metadata says it was drafted by Christopher
13 Bordeaux in the September 2017 timeframe.

14 If you want to take a minute to
15 go through it and let me know --

16 A Yeah, I'd appreciate that.

17 Q And while you go through that,
18 I'll just say for the record, the top of
19 the document says: "Summary of progress
20 re: enhanced communication about the
21 admissions process for legacies,
22 development cases, and alumni relations
23 priority applicants."

24 A Okay.

25 Q Do you know who Christopher

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2 A Again, it might be four or five
3 times a cycle.

4 Q And did you interact with him
5 over a period of years, if you recall?

6 A It was a couple of years maybe.

7 Q Okay. Well, if we start with
8 August 14th in the document, who is ICB, if
9 you know, in that first line?

10 A I do not know.

11 Q CWB?

12 A If you mentioned that was
13 Christopher Bordeaux, but that would be my
14 inference there.

15 Q LAC?

16 A I do not know.

17 Q Well, we might see these on an
18 org chart. It might help us.

19 A Right.

20 Q It says, in this August 14th
21 entry: "An improved admission process
22 might involve two enhancements to our
23 current process."

24 Do you see that language at the
25 end of the --

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2 A Yes.

3 Q -- that first paragraph?

4 A Uh-huh.

5 Q And then under that, the first
6 bullet point is: "A selection process that
7 brings awareness of legacy status,
8 development value, alumni relations value,
9 and other family connections to the early
10 part of the reading process."

11 Do you see that language?

12 A Yes.

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17 Q Okay. And it talks about
18 bringing awareness of, for example,
19 development value to the early part of the
20 reading process.

21 Do you see that?

22 A Yes.

23 MS. MASCHERIN: Object to the
24 form.

25 BY MR. NORMAND:

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2 development value. I mean, how rich a
3 family is might bear on their development
4 value, is that fair to say?

5 MS. MASCHERIN: Object to the
6 form.

7 A How -- yes.

8 Q Okay. And the proposal here is
9 to make development value an early part of
10 the reading process.

11 Do you see that language?

12 A Yes.

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3 Q And then there is a reference
4 after that, still in the August 14th part,
5 but at the bottom, after number 2: "LAC
6 asked CWB to research, develop, and
7 implement a system of reading and
8 communication that would achieve these
9 tasks."

10 Do you see that?

11 A Yes.

12 Q Do you know if any version of
13 that ever happened?

14 A I do not know.

15 Q Okay.

16 There is in the August 14th
17 entry, under number 1, the language: "This
18 might involve asking Meg Lysy to serve as a
19 second reader."

20 Did I pronounce that correct?

21 A Lysy.

22 Q Lysy. I'm going to get one
23 right, eventually.

24 Who was Meg Lysy at that time?

25 A At that time, Meg Lysy was head

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2 of the admissions ambassador's program.

3 Q Do you know why she would have
4 been singled out here to serve as that --
5 as the language says -- second reader?

6 MS. MASCHERIN: Object to the
7 form.

8 A I don't know exactly why.

9 Q And do you know what the
10 reference to "second reader" is?

11 A There would be a primary reader
12 in the admissions office who would read a
13 file, and there was always two readers of
14 every file to give comments about the
15 applicant. And so Meg would have served as
16 that second reader.

17 Q Okay.

18 I'm looking at the August 24th
19 entry --

20 A Okay.

21 Q -- which begins: "In a meeting
22 with LAC, CWB and ICB, Jeff Sassorossi
23 voiced need for better data sharing between
24 admissions and development."

25 Do you see that language?

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2 A Yes.

3 Q REDACTED

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2 A Yes.

3 Q Do you recall what problem is
4 being described there?

5 A That alumni relations had value
6 of certain applicants' parents and that may
7 not have been known to the admissions
8 office.

9 Q Do you recall discussing that in
10 the meeting that's -- the prospective
11 meeting that's referenced in that
12 August 30th entry?

13 MS. MASCHERIN: Object to the
14 form.

15 A I don't recall exactly, no.

16 Q The August 30th entry begins (as
17 read): CWB EJA met with Jeff Sassorossi,
18 Meg and Martha Beattie in Blunt.

19 Do you see that?

20 A Yes.

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13 Q Okay. And you had access to
14 those rating scores?

15 A Yes.

16 Q Do you know who else had access
17 to those rating scores?

18 A Anyone who worked in development
19 had access to the Advance database.

20 Q Do you know if those rating
21 scores were distributed with any frequency
22 to admissions?

23 MS. MASCHERIN: Object to the
24 form.

25 A I don't recall.

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2 Q Do you know if admissions had
3 access to those rating scores?

4 MS. MASCHERIN: Object to the
5 form.

6 A Not direct access, no.

7 Q Do you recall ever discussing
8 those rating scores with anyone from
9 admissions?

10 A I don't recall doing that, no.

11 Q Do you have any understanding of
12 whether, during your tenure, people in
13 admissions were aware of those rating
14 scores?

15 MS. MASCHERIN: Object to the
16 form.

17 A I don't recall.

18 Q Did you ever reference the
19 rating scores in the priority lists that
20 you created?

21 A Yes.

22 Q Did you ever rely on the rating
23 scores -- even in those instances in which
24 you did not cite the rating scores, did you
25 rely on the rating scores in creating your

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2 priority lists?

3 A In the initial creation, that
4 was one of the data points that I
5 considered in prioritizing, yes.

6 Q And maybe I missed the original
7 phrasing, but the people who created the
8 rating scores, did you say it was a
9 department within Dartmouth?

10 A Yes.

11 Q And what was the name of the
12 department?

13 A Research, development research.

14 Q Okay.

15 And do you know when they
16 started creating those rating scores?

17 A They took different forms or
18 different -- got different forms. They
19 were there when I came in 1987.

20 Q And do you recall what scale the
21 rating -- the ratings were on?

22 MS. MASCHERIN: Object to the
23 form.

24 BY MR. NORMAND:

25 Q Like what are the numbers we're

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2 talking about?

3 A Okay. They range from 1 to 9 --

4 Q Okay.

5 A -- and then individuals would

6 have, some individuals or many individuals

7 would have no rating score.

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4 Q Okay. And are there any
5 generalizations you can make about how
6 often your priority lists would reflect
7 your reliance on a rating score?

8 MS. MASCHERIN: Object to the
9 form.

10 A No. Can't do that.

11 Q Was there typically someone on
12 the priority list whose rating score was
13 important?

14 A Yes.

15 Q Was it typical that many people
16 would be on the priority list whose rating
17 scores were important?

18 MS. MASCHERIN: Object to the
19 form.

20 A There would be several, yes.

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7

Q Do you know if the criteria for
creating the rating score was ever set down
in writing anywhere?

10

A I don't know that, no.

11

12

Q Do you recall any particular
individuals, during your tenure, who were
part of creating the rating scores?

13

14

A Yes.

15

16

Q And could you tell me, if you
remember, who they are?

17

18

A The director of the research
area was Mike Foote.

19

Q Okay.

20

21

A And his staff would -- he and
his staff would develop those.

22

23

24

Q Anyone else apart from Mr. Foote
that you can recall overseeing that
department?

25

Maybe I shouldn't say that.

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2 course of your tenure -- were there
3 occasions in the course of your tenure
4 where you were expecting a donation in
5 connection with the prospective admission
6 of a child?

7 A Not -- not to -- no, no.

8 Q You never made a prediction in
9 that regard?

10 A I did not, no.

11 Q Do you know if others at
12 Dartmouth were making predictions in that
13 regard?

14 A I don't know that.

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21 Q Do you know if there was any
22 score or any other qualitative assessment
23 for the likelihood that someone would give?

24 A Not to my recollection.

25 Q There was no sort of expected

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2 Q Good afternoon, Mr. Sassorossi.

3 We're going to continue to do some
4 documents.

5 MR. NORMAND: We'll do Tab 24.

6 THE COURT REPORTER: This will
7 be Exhibit 19.

8 (Exhibit 19, e-mail with
9 attachment dated August 11, 2016, Bates
10 stamped DARTMOUTH_0000344156 through 166,
11 was marked as of this date.)

12 BY MR. NORMAND:

13 Q Exhibit 19 is an e-mail with an
14 attachment called "Sunde briefing package."
15 The e-mail is dated August 11, 2016.

16 You can see the first page is an
17 e-mail, and the second page begins
18 "Confidential Prospect Briefing for Paul
19 Sunde."

20 Do you see that language?

21 A Uh-huh.

22 Q And then further on, there is a
23 donor profile?

24 A Yep.

25 Q Are you familiar with the sort

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2 sure.

3 Q Okay. And if you look at page 1
4 of the donor profile, towards the sort of
5 middle of the page, it says: "Total
6 Giving." And then it says: "Estimated
7 Gift Capacity."

8 A Yes.

9 Q Do you see that?

10 A Yes.

11 Q Same question: Do you know who
12 would have estimated this number for
13 purposes of this document?

14 MS. MASCHERIN: Object to the
15 form.

16 A It would have been research that
17 would have done that.

18 Q Okay. And do you recall seeing
19 donor profiles like this attachment in the
20 course of your tenure at Dartmouth?

21 A Yes.

22 Q Okay. But you don't know who
23 created them necessarily?

24 A Not specifically, no.

25 Q Okay.

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2 was on the priority list --

3 Q Okay.

4 A -- so I could do a search.

5 Q So you would do that work --

6 A Yes.

7 Q -- of figuring out who on the
8 priority list had been admitted or not?

9 A Right.

10 Q And you would do that work every
11 year?

12 A Yes.

13 Q And then maintain that
14 internally?

15 A Yes.

16 Q Okay. We've spoken about the
17 priority list. Is it -- was it sort of a
18 living list that you would, you know,
19 update through the fall?

20 I'm just trying to get a feel
21 for the process by which you created it.

22 MS. MASCHERIN: Object to the
23 form.

24 A I created it as a one-off. At a
25 certain point during the admissions cycle,

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2 I would start to create that in
3 anticipation of the meetings coming up to
4 have something -- a starting point for
5 people to discuss the priority list.

6 Q Okay. And then you would update
7 it from week to week?

8 A There wasn't much to update.

9 Q Okay.

10 A So it was -- it was a static
11 list. And if it changed, I would make
12 those changes in my database to then be
13 able to create Excel reports from that
14 database.

15 Q So when you say it was a static
16 list, like you created it over a course of
17 days maybe and then it existed as such?

18 A Yes.

19 Q Okay. And, again, we spoke a
20 little bit about it, but are there general
21 statements you could make about the factors
22 that you thought were most relevant for
23 creating the list?

24 A It was sort of the rating of the
25 individual, my knowledge of the

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2 your tenure, you would have, did any of
3 them involve admissions?

4 A No.

5 Q Okay. And at the beginning of
6 your tenure, were there not typically the
7 three communications you just described?

8 MS. MASCHERIN: Object to the
9 form.

10 A There were not. Generally, it
11 was one big meeting of alumni relations and
12 development folks together.

13 Q Okay. Do you know why that
14 evolved over time to become the three
15 meetings?

16 A It was Bob Lasher's wish that it
17 be done that way.

18 Q And do you know why it was his
19 wish?

20 MS. MASCHERIN: Object to the
21 form.

22 A I don't know why, no.

23 Q Did you take notes during those
24 meetings?

25 A When there was something that

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2 impacted the list, I would take a note,
3 yes.

4 Q And do you know if -- where you
5 would have kept those notes?

6 A They would have been destroyed.
7 They were -- if they impacted the list, I
8 would make the appropriate notification or
9 notices and then just destroy those lists.

10 Q Oh, okay.

11 Why would you do that?

12 A For privacy concerns.

13 Q Would there be a then -- towards
14 the end of your tenure at least, would
15 there be a separate set of three meetings
16 for the general admissions priority list?

17 A Yes.

18 Q And it would be the same three
19 distinct communications that you just
20 described?

21 A Yes, yes.

22 Q How long would -- if you could
23 generalize -- would each of these
24 discussions take?

25 A I scheduled three hours for each

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2 A I don't know if they did, no.

3 Q If they had, do you think you
4 would have known about it?

5 MS. MASCHERIN: Object to the
6 form.

7 A They were under no obligation to
8 tell me. No.

9 Q Was it your understanding that
10 everyone in the admissions department had
11 access to the priority list?

12 A No. My understanding is that
13 they did not.

14 Q Okay. So who within the
15 admissions department, to your
16 understanding, did have access to the
17 priority list?

18 A It would have been the dean of
19 admissions, whether it was Lee Coffin or
20 Maria Laskaris.

21 Q Do you know if the dean made it
22 available to other people in the admissions
23 office?

24 A I do not know that.

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14 Q In the course of your tenure,
15 did you get performance reviews?

16 A Yes.

17 Q And who would typically give
18 them to you? Was there an HR department or
19 would it be your boss?

20 A It would be my boss.

21 Q All right. So whoever was your
22 immediate boss, or would it be the ultimate
23 department head who would do it?

24 MS. MASCHERIN: Object to the
25 form.

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2 for whom Leon Black was an advocate was
3 admitted?

4 A No, I do not know, no.

5 Q How about Richard H. Kimble?

6 A Not without -- no, I don't know.

7 Q I know you haven't memorized the
8 document, but as you've looked at it, are
9 there any ones that ring any bells as to
10 whether you know if the student evidently
11 at issue was admitted?

12 A No, no.

13 Q And, again, just so I'm using
14 your phrasing, how would you describe the
15 document that you maintained that would
16 indicate whether the students I've asked
17 about were admitted?

18 A It would be on a separate
19 document that would have -- once I got the
20 download from admissions, would have that
21 decision on it.

22 Q And do you recall if you
23 typically gave that document a name from
24 year to year?

25 A It might have been something

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2 like results of application, something of
3 that nature.

4 Q And was that on the Advance
5 database or was that something you
6 maintained, you know, on your own hard
7 drive or something?

8 A That was something that I would
9 have maintained. It was not in Advance.

10 Q Do you know if it was maintained
11 on any school database or school files?

12 A I have no idea.

13 Q Do you know one way or the
14 other, when you left, were those lists that
15 you had maintained, if you know, were they
16 destroyed?

17 A I destroyed the list that I had
18 at the time. But beyond that, I don't
19 know.

20 Q When you say you destroyed the
21 list that you had at the time, you mean as
22 you were leaving the school?

23 A Right, the paper lists that I
24 had were shredded.

25 Q Did you maintain those lists

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2 electronically on a computer?

3 A Yes, and that computer was left.

4 Q You left the computer. But

5 those files on that computer, to your

6 understanding, were not on a school

7 database?

8 A Correct.

9 Q And was there some reason that

10 you maintained those files that way?

11 MS. MASCHERIN: Object to the

12 form.

13 A Again, it was a privacy issue.

14 Q And you don't know what happened

15 with that computer?

16 A I do not.

17 Q Okay. Did you have occasion to

18 e-mail those lists from year to year?

19 A Before we started doing the

20 secure server, yes.

21 Q And do you recall when you

22 started doing the secure server?

23 A It might have been two or three

24 years prior to my requirement.

25 Q And would you take the document

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2 A It would be in a case where
3 we -- I had not received any letter of
4 recommendation directly from the individual
5 that they were interested in a
6 particular -- that particular applicant, or
7 I had not received any e-mail communication
8 to that effect.

9 Q Okay. So I had showed you
10 columns AV and AW.

11 A Uh-huh.

12 Q And then we sort of talked about
13 them in concept. But do you recall what AV
14 and AW were, in particular?

15 A I do not, no.

16 Q And those numbers there don't
17 refresh your recollection, I take it?

18 A Not without seeing the expanded
19 version of that column.

20 Q So this spreadsheet, before the,
21 I guess, protected database or protected
22 drive, you know, change in policy at the
23 school, before that time, a spreadsheet
24 like this would have been maintained on
25 your computer?

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2 A Yes.

3 Q And that spreadsheet could be
4 expanded so that an interested viewer could
5 figure out what exactly the columns
6 detailed?

7 A Only if they had access to my
8 computer.

9 Q That's really what I'm asking.

10 A Yeah.

11 Q And that spreadsheet in this
12 form -- so not with the admissions
13 results -- that spreadsheet would have been
14 e-mailed around in the way that we see in
15 the exhibit we've been looking at?

16 A They would have been distributed
17 in PDF format.

18 Q Oh, okay.

19 A So...

20 Q And after the secured, you know,
21 server was used, would you still send it
22 around in PDF form or would you just give
23 people access to the server?

24 A It was done in PDF form.

25 Q Okay. And do you know whether,

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when you sent the admissions results, that
was sent around in PDF form?

A Yes.

Q But you're confident you didn't
send the admissions results around in PDF
form by e-mail after the secured server
started to be used?

A I can't recall if I can be, you
know, 100 percent confident.

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20 MR. NORMAND: Let's do Tab 30.

21 THE COURT REPORTER: This will

22 be Exhibit 25.

23 (Exhibit 25, Power Point

24 presentation entitled "Financial aid

25 Office, 2015-2016. What have we done?